



## MORRO BAY NATIONAL ESTUARY PROGRAM

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May 17, 2001

Brian Baird, Ocean Program Manager  
Resources Agency of California  
1416 Ninth Street, #1311  
Sacramento, CA 98514

Dear Mr. Baird,

Thank you for the opportunity to comment on the Draft Policy on Coastal Erosion. In general, I applaud the State's approaches to beach replenishment and hazard avoidance. There is, however, one section of the draft policy that needs to be clarified in the case of small estuaries such as Morro Bay. Specifically, it would be helpful to clarify that this policy is not meant to preclude sediment capture and removal upstream of shallow coastal lagoons where such activities protect and enhance the environment of the lagoons.

Morro Bay is California's first State Estuary and is one of only 28 National Estuaries. Through the National Estuary Program, which is overseen by the US EPA, a Comprehensive Conservation and Management Plan was prepared for Morro Bay and its watershed. That Plan has been approved by the Governor and by the US EPA.

The CCMP identified sedimentation as the most serious threat to the ecological health of Morro Bay. Sedimentation in Morro Bay has been accelerated above natural rates because of human activities throughout the watershed such as mining, development, farming and grazing. In several areas, creeks have been contained in levees in order to protect croplands from flooding. This practice has also contributed to unnatural rates of deposition in the bay rather than in the natural floodplains of those creeks. This has resulted in the premature conversion of mudflats to salt marsh and of salt marsh to upland meadows, the loss of eelgrass beds which are recognized as extraordinarily rare and productive habitat, the loss of protected open water habitats, and increases in water temperature as the bay becomes shallower, resulting in the spread of algal mats.

Sedimentation is, of course, a natural process but recent estimates indicate that this estuary could be filled within 50-300 years--much faster than the thousands of years geologists and hydrologists estimate if the watershed had not been altered. Furthermore, most of California's lagoons have been filled for development, leaving our State largely barren of its once abundant coastal wetlands. For these reasons, the few remaining and relatively pristine lagoons like Morro Bay need to be protected and enhanced.

Toward that end, many public agencies at all levels of government, along with non-profits, businesses, landowners and the public have worked to retard erosion in the watershed and to reduce the amount of sediment that reaches the bay. Among the strategies has been the creation of upstream sediment traps. In the largest and most successful case, the State provided funding to the local Resource Conservation District to purchase bottomlands adjacent to the main creek

leading to the bay. The creek had been moved from its natural course and confined to earthen levees. Once the site was in public ownership, the levees were opened and a secondary channel was created through the bottomlands. This allowed the creek to assume a more natural morphology and the re-creation of the natural floodplain. Not only did that capture large amounts of sediment but it allowed the restoration of wetlands and an extensive willow forest. Efforts are underway to find other locations where similar sediment traps can be constructed. It is conceivable that in some cases, the periodic dredging of these traps may occur to replenish the sediment capture potential of the sites.

This approach has been recognized as beneficial to the environment. The California Coastal Conservancy, Department of Water Resources, Department of Fish and Game, Department of Parks and Recreation, California Coastal Commission, and others have all participated with federal and local agencies in the planning, implementation and management of this strategy.

The potential problem arises with policy II.B.1 which states "that developments planned, constructed or authorized by State agencies should meet the following conditions...the development...will not reduce the quality or quantity of the natural supply of sediment to the coastline." The definition of "coastline" is not limited to the beach where the ocean meets the land but includes "the line where terrestrial processes give way to marine processes, tidal currents, wind waves, etc." By that definition, Morro Bay lagoon is surely part of the coastline.

The Morro Bay estuary does not need sediment for beach replenishment or protection of shoreline structures. However, further sedimentation is harmful to the lagoon ecology. I am concerned that the blanket language of this policy might inadvertently interfere with the efforts to reduce sediment in the bay through sediment capture and removal strategies in the watershed.

It appears that the policy would allow the reduction of sediment to the level of "natural supply" but that term is not clear and is rather difficult to ascertain. Furthermore, because the bay has suffered unnatural levels of sedimentation for over a century, some extraordinary measures to control further sedimentation are surely justified.

Please include an exemption for shallow lagoons, or a clarification that this is not intended to preclude effective sediment control measures aimed at protecting the ecological value of shallow lagoons such as Morro Bay. With such an exemption or clarification, we would not have a problem with the draft policy.

Because of scheduling conflicts, I may not be able to attend the public workshops near Morro Bay. Please continue to provide the Morro Bay National Estuary Program with drafts of the policy and notice of any workshops, hearings or other public meetings. Thank you for your consideration. Please call me if you have any questions or would like to discuss this further.

Sincerely,



Michael Multari  
Director